

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

SAMUEL A. SCHWARTZ,

Plaintiff,

v.

No. 07 C 6963

ABN AMRO MORTGAGE GROUP, INC.
and CITIMORTGAGE, INC.,

Defendants.

**ABN AMRO MORTGAGE GROUP, INC.'S AND CITIMORTGAGE, INC.'S MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO
PLAINTIFF'S COMPLAINT**

Defendants ABN AMRO Mortgage Group, Inc. and CITIMORTGAGE, INC. hereby move to extend the time to answer or otherwise plead to the complaint of Samuel Schwartz. In support thereof, Defendants state as follows:

1. Counsel for Defendants was retained in early December 2007 with respect to this matter.
2. Additional time within which to conduct an investigation into the allegations of the complaint is required. The undersigned counsel, having primary responsibility for this matter, will be out of the country during the week of December 17, 2007. Further, counsel for Defendants has requested, but not yet received, the loan file relating to the mortgage transaction giving rise to Plaintiff's complaint.
3. This motion is not brought for purposes of undue delay, but rather to allow the undersigned counsel to conduct an investigation into the allegations of the complaint and prepare a responsive pleading.

4. The undersigned counsel conferred with Plaintiff, an attorney licensed to practice law in the State of Illinois, who did not object to Defendants' request for an extension of time to answer or otherwise plead.

WHEREFORE, Defendants ABN AMRO Mortgage Group, Inc. and CITIMORTGAGE, INC. hereby move to extend the time to answer or otherwise plead to the complaint of Samuel Schwartz to January 15, 2007.

DATED: December 12, 2007

Respectfully submitted,

ABN AMRO MORTGAGE GROUP, INC.
AND CITIMORTGAGE, INC.

By: s/ Jeffrey M. Heftman
One of Their Attorneys

Diane M. Kehl
Jeffery M. Heftman
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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2007, I electronically filed the foregoing **MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court using the CM/ECF system and have served same on:

Samuel A. Schwartz, Esq.
3960 Howard Hughes Parkway
Suite 500
Las Vegas, Nevada 89169

via facsimile transmission and by depositing the same in the U.S. mail, first-class postage prepaid, at 222 North LaSalle Street, Chicago, Illinois 60601-1003 by 5:00 p.m. on December 12, 2007.

s/ Jeffery M. Heftman _____